

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ALAN ROSA,

Plaintiff,

v.

X CORP.; X HOLDINGS CORP.;
ELON MUSK; STEVE DAVIS; JOHN
DOES 1-10 and ABC CORPS. 1-10,

Defendants.

Hon. Brian R. Martinotti

Case No.: 2:23-cv-22908-BRM-AME

**DECLARATION OF SEAN P.
LYNCH IN SUPPORT OF
DEFENDANT X CORP.'S MOTION
TO COMPEL ARBITRATION**

Motion return date: April 15, 2024

SEAN P. LYNCH, of full age, hereby declares as follows:

1. I am an attorney with the law firm of Morgan Lewis & Bockius LLP, attorneys for Defendants X Corp., X Holdings Corp., Elon Musk and Steve Davis.

As such, I am familiar with this matter and other matters against Defendants.

2. I am aware of at least one individual arbitration before JAMS filed against X Corp. that has proceeded to the Arbitrator because the claimant paid their half of the arbitration initiation fees, and X Corp. paid the other half. The parties are currently briefing the issue of whether the JAMS' Minimum Standards apply to the arbitration before their individual Arbitrator.

3. I am also aware of another private arbitration in which the claimant paid their half of arbitration initiation fees, X Corp. paid its half, and the Arbitrator is overseeing the litigation.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Dated: May 13, 2024

/s/ Sean P. Lynch
Sean P. Lynch, Esq.